

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PLAINTIFF DARYELLE LAWANNA PRESTON hereby proposes the following exhibits to be offered at trial:

Preston v. City of Oakland, et al., No. 3:14-CV-02022 NC
Plaintiff's Updated Exhibit List - 1

No.	Description	Sponsoring Witness	Stipulations/ Objections	Date Admitted
	19-23)			
3.	Howard Jordan email to Deanna Santana re: Rainbow Teen Center, January 5, 2012 (OAK00010078-10080)	Santana		
4.	Alexandra Orologas email to Lawanna Preston, Scott Johnson re: Employee Relations move, January 12, 2012 (LP 59)	Preston		
5.	Lawanna Preston email to Alexandra Orologas re: inter office memo re: bargaining, February 15, 2012 (OAK00000716)	Preston		
6.	Draft Agenda Report re: Rainbow Teen Center, February 20, 2012 (LP 97-119)	Santana		
7.	Deanna Santana email to Barbara Parker, etc. re: Confidential Draft re: Rainbow Teen Center, February 20, 2012 (LP 94)	Santana		
8.	Final Agenda Report re: Rainbow Teen Center, February 24, 2012 (OAK00000874-893)	Preston		
9.	Video recording of Oakland City Council Meeting, March 6, 2012	Preston		
10.	Deanna Santana email to Lawanna Preston re: Preston's remarks at the Council meeting, March 6, 2012 (OAK00005706)	Preston		
11.	Teresa Reed email to Lawanna Preston re: Local 55, March 23 2012 (LP 522)	Preston		
12.	Employee Performance Appraisal Form and Performance Plan for Lawanna Preston, April 30, 2011-	Santana or Preston		

No.	Description	Sponsoring Witness	Stipulations/ Objections	Date Admitted
	May 1, 2012 (OAK00001077-1082)			
13.	Deana Santana email to Lawanna Preston, Howard Jordan, Philip Ewell re: Local 55 and OPOA bargaining, January 4, 2013 (OAK00000414-416)	Santana		
14.	Philip Lamont Ewell's Confidential Summary Report re: union negotiations, February 20, 2013 (LP 253-257)	Ewell or Preston		
15.	TC Everett email to Judith Dalke re: Lawanna Preston email problem, June 6, 2013 (LP 271)	Everett or Preston		
16.	Joe Keffer email to Lawanna Preston, etc. re: SEIU grievance, June 26, 2013 (Preston deposition exhibit 6)	Keffer or Preston		
17.	Agreement between the City of Oakland and Local 55, June 28, 2013 (OAK00005439)	Reed		
18.	Lawanna Preston email to Deanna Santana, Doryanna Moreno, re: Fire Chief's extension of Local 55 agreement, July 3, 2013 (LP 290-291)	Preston		
19.	Teresa Reed email to Winnie Anderson re: Local 55, July 3, 2013 (OAK00001054-1055)	Reed		
20.	Lawanna Preston email to Desley Brooks re: Amending the Local 55 MOU, July 4, 2013 (LP 286-289)	Preston		
21.	NO EXHIBIT			
22.	Trinette Gist Skinner email to Lawanna Preston, Winnie Anderson re: Local 55, July 5, 2013	Reed or Preston		

No.	Description	Sponsoring Witness	Stipulations/ Objections	Date Admitted
	(OAK00005436-5437)			
23.	City of Oakland Special Meeting of the Council minutes, July 25, 2013 (Dkt. 86, pp. 202-206)	Simmons		
24.	NO EXHIBIT			
25.	Lawanna Preston email to Winnie Anderson, Katano Kasaine, re: SEIU bargaining meeting, August 5, 2013 (Preston deposition exhibit 5)	Preston or Kasaine		
26.	Deanna Santana email to Katano Kasaine, etc. re: SEIU, August 6, 2013 (LP 321)	Santana or Kasaine		
27.	Winnie Anderson handwritten notes re: SEIU bargaining meeting, August 6, 2013 (OAK00014062-14063)	Anderson		
28.	Dwight McElroy handwritten notes re: SEIU bargaining meeting, August 6, 2013 (McElroy deposition exhibit 16)	McElroy		
29.	Winnie Anderson email to Katano Kasaine re: SEIU bargaining meeting, August 6, 2013 (OAK00000987-988)	Anderson or Kasaine		
30.	NO EXHIBIT			
31.	Lawanna Preston email to Katano Kasaine re: SEIU grievance, September 10, 2013 (LP 372-373)	Preston		
32.	Deanna Santana email to Lawanna Preston re: SEIU grievance, September 10, 2013 (OAK00010331)	Santana		

No.	Description	Sponsoring Witness	Stipulations/ Objections	Date Admitted
33.	Lawanna Preston to Sandre Swanson re: SEIU grievance, September 12, 2013 (LP 380)	Preston		
34.	Lawanna Preston email to Deanna Santana re: SEIU grievance, September 17, 2013 (LP 390)	Preston		
35.	Oakland City Council Ordinance, September 17, 2013 (OAK00000032)	Simmons		
36.	Deanna Santana email to Lawanna Preston re: SEIU grievance, September 18, 2013 (LP 407-408)	Santana		
37.	Lawanna Preston email to Barbara Parker, Doryanna Moreno re: SEIU grievance, September 19, 2013 (LP 409)	Preston		
38.	NO EXHIBIT			
39.	NO EXHIBIT			
40.	Donna Hom email to Deanna Santana, Arturo Sanchez re: SEIU grievance, September 29, 2013 (OAK00010211)	Santana		
41.	Lawanna Preston email to Barbara Parker, Deanna Santana re: SEIU grievance, September 29, 2013 (LP 434)	Preston		
42.	Katano Kasaine email to Dwight McElroy re: SEIU grievance, October 1, 2013 (McElroy deposition exhibit 21)	McElroy or Kasaine		
43.	City/SEIU Local 1021 TPT Negotiations 2013 Tentative Agreement, October 2, 2013 (Keffer deposition exhibit 13)	Keffer or Preston		

No.	Description	Sponsoring Witness	Stipulations/ Objections	Date Admitted
44.	Notice of Termination of Lawanna Preston, October 3, 2013 (OAK00000894-895)	Santana		
45.	Deanna Santana email to Lawanna Preston re: termination, October 3, 2013 (LP 440-441)	Santana		
46.	Lawanna D. Preston resume, October 2013 (LP 450-451)	Preston		
47.	Barbara Parker email to Joe Keffer, Deanna Santana, etc. re: SEIU grievance, October 14, 2013 (Keffer deposition exhibit 11)	Keffer		
48.	NO EXHIBIT			

Dated: August 26, 2015

SIEGEL & YEE

By: /s/Dan Siegel
Dan Siegel

Attorneys for Plaintiff
Daryelle LaWanna Preston